



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

WA 6819

8-14-07

10a

AUG 14 2007

Reply To
Attn Of: AWT-121

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. William Ernst
Company Energy & Environmental Affairs
The Boeing Company
P.O. Box 3707
MC 1W-12
Seattle, WA 98124-2207

**Re: Draft Interim Measure Work Plan Characterization of Caulk in Concrete Pavements at Boeing Plant 2, Seattle/Tukwila, Washington
Resource Conservation and Recovery Act (RCRA) Docket No. 1092-01-22-3008(h)
EPA ID No. WAD 00925 6819**

FILE COPY

FILE COPY

Dear Mr. Ernst:

The U.S. Environmental Protection Agency Region 10 ("EPA") has reviewed the above-referenced document ("work plan"), dated May 2007, and has the following comments:

General Comment

1. The work plan presents a good characterization plan for the identification of caulk at Boeing Plant 2, but an additional characterization (sampling) will be needed for the identification of caulk that is visually degraded or eroded. This will enable Boeing to identify those areas needing immediate actions and assist in the prioritization of areas that may require some form of remediation or stabilization.

Specific Comments

1. Section 4.3, Alternate: Stabilization until Demolition – All Caulk greater than 25 ppm, page 9

In the discussion of this section, a concentration value of greater than 50 ppm PCB's is used, contrary to the greater than 25 ppm in the title. If Boeing's intention was to make this section for stabilization of PCB containing materials with concentrations greater than 50 ppm PCB's, delete this section, since all PCB material in excess of 50 ppm must be removed as outlined in Section 4.2. If this section was intended to be a section for materials ranging from 25-50 ppm, incorporate the material in this section in section 4.1 of the work plan.

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2. Section 5.1, Preliminary Report, page 10

Add a last sentence that includes the use of confirmation sampling to verify PCB containing material with concentrations in excess of 25 ppm PCB's.

3. Section 6.0, page 11, Table

Create a Task 10 for submission of a work plan for removal and stabilization of PCB containing concrete caulk. Boeing is aware that caulk with concentrations in excess of 50 ppm PCB's exists on site and will require future remediation. Therefore, the work plan for removal of this material must be referenced and a tentative schedule for submission of the work plan referenced.

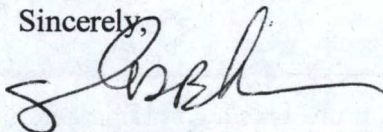
4. Sampling and Analysis Plan, Section 7.0 Reporting, page 11, last sentence

Remove "if any" from the last sentence as explained in specific comment #3 above.

In accordance with Section X of the January 1994 Administrative Order on Consent Boeing must revise the subject work plan responsive to all of these comments. The revised work plan must be submitted to EPA within 30 days from receipt of this letter.

Should you have questions or comments, please don't hesitate to call me at 206-553-4166 or you may email me at Blocker.Shawn@epa.gov.

Sincerely,



Shawn Blocker
Project Coordinator
RCRA Corrective Action and Permits Team

cc: Hideo Fujita, Ecology – NWRO
Brad Helland, Ecology – NWRO

File: 10a

Bcc: Kris Flint, ECL
 Charles Ordine, ORC
 Bernie Zavala, OEA
 Julius Nwosu, OEA
 Don Matheny, OEA
 Laura Castrilli, AWT
 Suzanne Skadowski, ETPA
 Marla Steinhoff, NOAA/ECL

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CONCURRENCES:

INITIALS <small>ES</small>		see below		POLICY FILE		RCRIS INFO SUBMITTED	
NAME <small>ES</small>	BLOCKER	PEER REVIEW	ORDINE	YES	NO	YES	NO
DATE <small>ES</small>		see below				ATTACHED	

PEER REVIEW:

INITIALS <small>ES</small>		<i>roh</i>					<i>CF</i>
NAME <small>ES</small>	CASTRILLI	<i>for</i> BROWN	HEDEEN	ORLEAN	MEYER	PALUMBO	FISHER
DATE <small>ES</small>		<i>8/9/07</i>					<i>8/9/07</i>

ACTION/ROUTING INSTRUCTIONS

1. AUTHOR: Shawn Blocker

File Location/Name: Caulk IM

2. SECRETARY/ADMIN REVIEW: Denise

3. Concurrences: See attached

CONCURRENCES

Name:

Initials/Date:

4. SIGNER: Shawn Blocker

ACTIONS NEEDED

CC: MS./MRS./MR.: See Attached

STREET: _____

CITY,STATE,ZIP: _____

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